



# Morris Ag Air and Sons, Inc.

P.O. Box 209 • Orovada, Nevada 89425

July 3<sup>rd</sup>, 2006

U.S. Department of Transportation,  
Docket Operations, M-30  
West Building Ground Floor, room W12-140  
1200 New Jersey Ave, SE.  
Washington, DC 20590

DEPT OF TRANSPORTATION  
Docket Operations  
M-30  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Ave, SE  
Washington, DC 20590

To Whom It May Concern:

I have read through the Notice of proposed rulemaking regarding Thrush aircrafts, models 600, S2D and S2R. I currently am a co-owner of an operation that owns, operates and maintains six thrush aircrafts. I possess both an A&P, and an IA. I have been flying and working on planes for over 20 years of which eight have involved the very Thrushes in question.

Of the many points I feel compelled to make, the first is that why should we fix something that is not broken. By this I mean no disrespect just that the current inspections do WORK; cracks are found and handled, which was the point of the AD. I have heard of spar caps cracking within 2000 hours on late model airplanes, and others going 20,000 hours.

These new Avenger kits and new spars cannot guarantee that the same problem will not be encountered in the future. These older model Thrushes have been flying since the early 70's and have a pretty good track record. In my opinion, this proposal is quite a test; shifting the burden of the testing, stability and safety onto the pilots who fly these aircraft to make a living.

The Thrush aircraft is an excellent Ag Plane, it's tough, durable, efficient and fly's at the right speed for accurate aerial applications; not too fast, not too slow and provides a great spray pattern. If this AD comes to pass, it could prove to be unbearable to many operators. The regulation and excessive costs involved would force some operators into changing the spar caps as required, but cutting corners on other pertinent maintenances.

Another point I would like to touch on is that every operation and its operators are different. They may operate on dirt strips or paved runways and just as varied as the airstrips are the differences in the way pilots fly planes and the company's maintenance



# Morris Ag Air and Sons, Inc.

P.O. Box 209 • Orovada, Nevada 89425

practices. I believe that aggressive flying has a lot to do with this spar problem and that the entire industry should not be penalized for the actions of those pilots.

As an operator of six thrush planes with various hired pilots in addition to me and my brother. I do not feel any apprehension about the integrity of our aircrafts or climbing into any one of the cockpits to fly them. I do believe that aggressive flying is as detrimental to any aircraft as flying through a power line, hitting a ditch or just plain wrecking the aircraft.

Another problem I see is that the costs of such an AD will be almost impossible to pass on to the farmer, especially with low commodity prices.

I would appreciate you taking the time not only to read this letter, but to take each of these points into consideration prior to penalizing all applicators for the actions of a few.

As an alternative to replacing the spar caps, I suggest that you require the big butterfly installation plus the current time between Eddy Current or Mag Particle inspections in addition to a visual inspection every 100 hours.

Thank you for your time on this issue, please feel free to contact me if you would like clarification on any of the previously made points.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Morris". The signature is fluid and cursive.

Michael Morris  
775-304-1958